

4.0 DOE-ORO/BJC IMPROVEMENTS PROJECT APPROACH AND CAP DEVELOPMENT

This section describes the approach used by DOE-ORO and by BJC to develop specific corrective actions. These corrective actions respond to the areas of concern in the DNFSB October 15, 2001 letter to DOE from the DNFSB and improvements needed based on subsequent DOE and BJC assessments of operations of nuclear facilities, as discussed in Section 2.0.

4.1 DOE-ORO/BJC ISMS IMPROVEMENTS PROJECT

Based on the issues identified by the various internal and external assessments, DOE-ORO and BJC initiated a comprehensive ISMS Improvements Project. The overall objectives include ensuring that all causal factors are addressed and corrective actions are integrated for efficiency, that actions are effective and institutionalized in both the DOE-ORO and BJC organizations to prevent recurrence of the issues, and that appropriate priorities are established for the follow-up actions. Considering the breadth of the issues the DOE-ORO/BJC project team elected to utilize the four areas highlighted in the DNFSB October 15, 2001 letter as a basis for capturing all of the issues, observations, and finding from the assessments. Four task teams were established to initiate corrective action development for:

- SB Improvements
- DOE Orders of Interest to the DNFSB
- Technical Competence/Training/Qualifications/Staffing
- ISMS Improvements

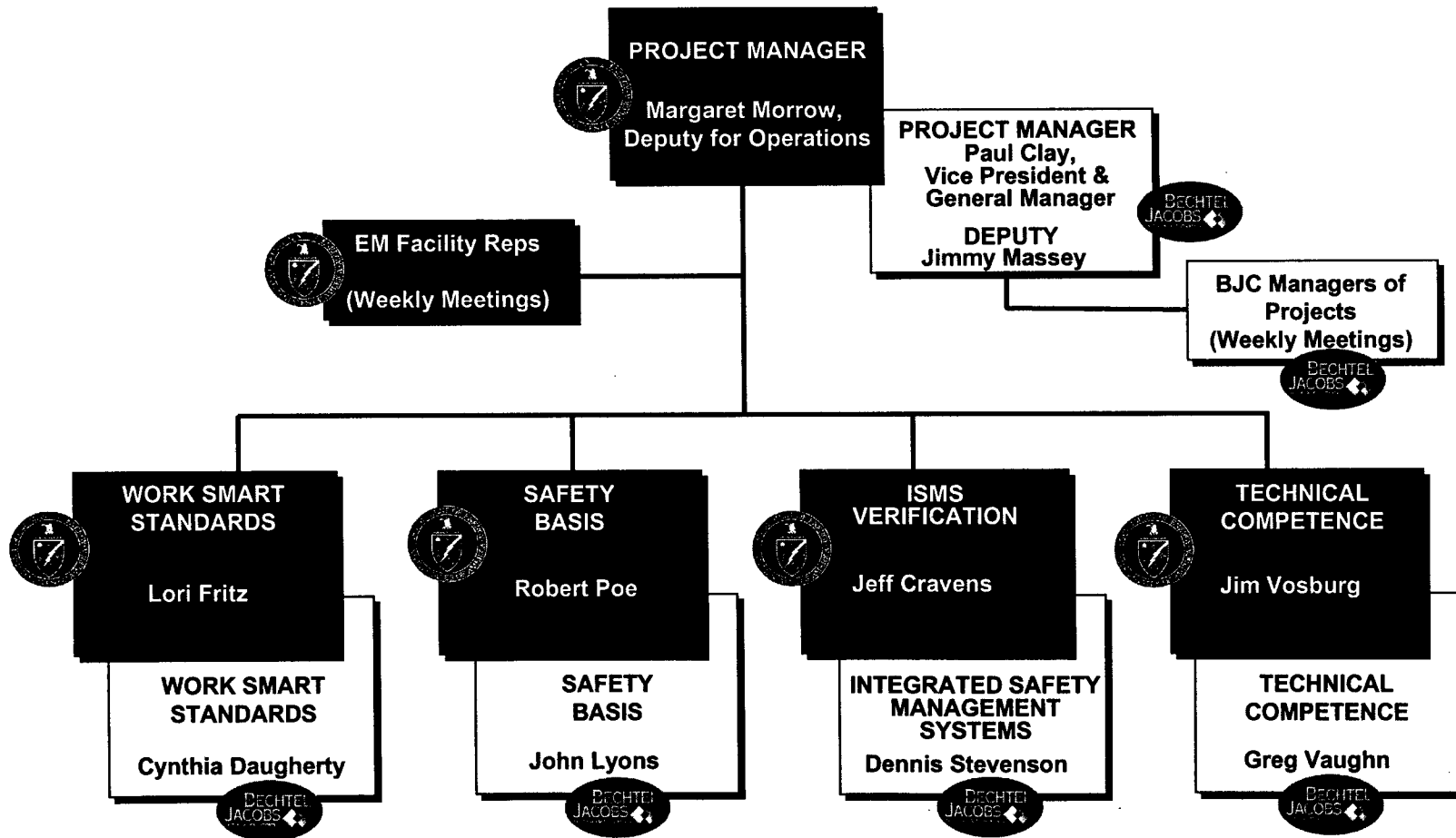
The task teams are led by DOE-ORO and BJC counterparts who have communicated frequently. The ISMS Improvement Project Team is co-led by DOE-ORO and BJC executive managers who meet weekly to review progress against plans and provide direction for the team. The ISMS Improvements Project Team Organization is depicted in Figure 4.1.

In several instances, the joint DOE-ORO/BJC task teams have established working groups or technical assessment teams to further address issues and implement process improvements. For example, a SB Working Group has been established to meet weekly for the purpose of instituting process improvements and developing guidance for both the DOE-ORO and BJC organizations. The group is comprised of DOE-ORO EM, DOE-ORO NSD, and BJC Nuclear Safety staff. The SB Working Group facilitates SB process improvements, addresses technical standards or interface issues, coordinates SB update planning and SB document reviews to achieve SB update/upgrade objectives.

The project team assimilated findings generated by multiple, successive assessments into an integrated project effort. In addition, DOE-ORO and BJC already had initiated a plan to revise and upgrade the SB documents to achieve compliance with 10 CFR 830 Subpart B. In many instances, the upgraded documents will address the findings documented for the current, existing SB. Therefore, the project team developed this CAP to reflect the synthesis of issues resulting from multiple assessments into an integrated and comprehensive CAP.

The outline for this CAP was based on guidance provided in a letter from the Assistant Secretary for EM to Field Office Managers, *Policy for Content and Implementation of Corrective Action Plans (CAP)*, dated October 4, 2001 which sets policy on expected content of CAPs.

Figure 4.1 Integrated DOE/BJC ISMS Project Teams



4.2 DOE-ORO AND BJC CAP DEVELOPMENT

Table 4.1 provides an overview of the guidance used by DOE-ORO and BJC for developing corrective actions.

Table 4.1 DOE-ORO and BJC Corrective Action Development Guidance

General
<p>Document the action or action(s) that will lead to ultimate resolution of the problem/issue and minimize the likelihood of recurrence. Be specific in defining what will be done (description of corrective action), who will do it (DOE/BJC responsible person), when work on the action will begin (initiation date), when it will be completed (completion date), and what evidence can be provided for closure (closure documentation). For each action step enter the information for these five items directly on this form which will become part of the overall CAP.</p>
<p>Description of Corrective Action (I/CATS Number)</p> <p>Begin each action with an action verb using terms such as: revise, implement, install, develop, and document. Avoid use of terms such as continue, review, improve, enhance, evaluate, and emphasize. If the corrective action involves more than one step, state each action separately and provide the needed information for each step on responsible person, initiation date, completion date, and closure documentation. Concisely state each action step separately and don't group multiple tasks together into single actions. Keep the action statement short by stating what will be done and not how it will be performed. Use terms that make the action closeable and measurable. Avoid use of terms such as all, continue, on-going, and improve. If the action must be on-going, specify how the completion can be measured, verified, and documented such as through an assessment and final assessment report.</p> <p>If a CAP addressing the same issue has been issued in response to a different assessment, please document that assessment and provide the ORION or the I/CATS reference. Do not duplicate an existing CAP.</p>
<p>DOE-ORO/BJC Responsible Person</p> <p>Clearly establish for each action step the DOE/BJC responsibility prior to finalizing this step. Resource allocations to support the actions must be available. Ensure qualification and training needs to perform the action(s) are identified and understood.</p>
<p>Corrective Action Initiation Date</p> <p>Must be specific for each action(s). Consider resource and funding availability, dependence on other DOE or BJC actions, and priority with existing or upcoming commitments.</p>
<p>Expected Completion Date</p> <p>Refer to discussion of initiation date. Also consider efforts needed to document action completion.</p>
<p>Corrective Action Closure Documentation Required</p> <p>Begin development of the action plan with the end in mind. Establish a definition of what constitutes completion of each action step, how you will document completion of the action, and what evidence of completion can be provided.</p>
<p>Support Action Required?</p> <p>Describe any actions required by DOE necessary to support completion of the corrective action(s). If DOE action is necessary, be sure that the DOE action is understood and accepted by the responsible DOE party and included in the DOE CAP for this assessment. This entry can be made once for the recommendation being addressed and does not have to be repeated for each step of the action plan.</p>
<p>Link to Other Corrective Action? (Specify)</p> <p>Describe the linkage to any other corrective action(s) developed in response to the DOE-HQ Assessment of BJC and ORO SB Authorization and Approval Processes, February 1, 2002 or to other corrective actions developed in response to the DNFSB October 15 letter to DOE. Use this to avoid duplicate entries in developing the integrated CAP.</p>